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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL ROBBINS,

Petitioner,

vs.

JERRY HOWELL, *et al.*,

Respondent(s).

Case No. 2:19-cv-02153-APG-VCF

**MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONSE TO FIRST AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 20)**

(FIFTH REQUEST)

Respondents move this Court for an enlargement of time of 14 days from the current due date of February 3, 2021, up to and including February 17, 2021, in which to file their Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20). This Motion is made pursuant to Fed. R.Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the fifth enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: February 3, 2021.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

IT IS SO ORDERED:

Dated: February 4, 2021


ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

DECLARATION OF JAIMIE STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Daniel Robbins v. Jerry Howell, et al.*, Case No. 2:19-cv-02153-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This is my fifth request for an extension to file the Response to Petitioner's First Amended Petition for Writ of Habeas Corpus (ECF No. 20), and the instant Motion is made in good faith and not for the purpose of delay.

3. The Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20) is currently due on February 3, 2021.

4. I am unable with due diligence to timely complete the Response herein. I am still in the process of finalizing the Response. Due to the ongoing COVID-19 crisis, I have been dealing with extensive logistical issues while attempting to work from home. These logistical issues have increased as the pandemic has continued and worsened as of late. I am also still dealing with extensive medical issues and state-mandated furloughs, both of which have necessitated time out of the office. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Response in a timely fashion,

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. Based on the foregoing, I respectfully request an enlargement of time of 14 days, up to and including February 17, 2021, to file the Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20).

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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on this 3rd day of February, 2021.

3 /s/ Jaimie Stilz

4 Jaimie Stilz (Bar No. 13772)

5 Deputy Attorney General

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 3rd day of February, 2021, I served a copy of the foregoing **MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS (ECF NO. 20)**, by U.S. District Court CM/ECF electronic filing, to:

Lisa A. Rasmussen, Esq.
THE LAW OFFICES OF KRISTINA
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/s/ J. Stilz
An employee of the Office of the Attorney General